CHAPTER 4.0 PROJECT ALTERNATIVES

4.1 Rationale for Alternative Selection

Section 15126.6 of the State CEQA Guidelines requires that an *"EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."* As described in the analysis of the proposed Project within Chapter 2.0 of this SEIR, implementation of the proposed Project would result in the following significant and unavoidable impacts:

- Significant and unavoidable direct and cumulative impacts to air quality due to long-term operational emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$ (**Impact AQ-2**);
- Significant and unavoidable direct impacts to air quality due to exposure of the MEIR to an incremental cancer risk of 32.0 in one million, which would exceed the County DPLU's threshold of 1.0 per 1 million (**Impact AQ-3)**;
- Significant and unavoidable direct impacts to air quality due to exposure of future on-site workers to incremental cancer risks in excess of the County DPLU's threshold of 1.0 per 1 million (**Impact AQ-4**);
- Significant and unavoidable direct and cumulative noise impacts to three existing residential uses that would be impacted by noise generated by Project-related traffic (previously identified by the EOMSP Final EIR; no new impact identified); and
- Significant and unavoidable direct impacts to circulation and traffic resulting from a projected deficient LOS at three (3) study area intersections (**Impacts TR-13, TR-17, and TR-34**).

The proposed Project would also result in significant but mitigable impacts to Air Quality, Biological Resources, Cultural Resources, Noise, Paleontological Resources, Public Services, and Traffic.

This chapter describes and evaluates alternatives to the proposed Project that would reduce or minimize the Project's significant adverse environmental effects while still achieving the Project objectives listed in SEIR Section 1.1. CEQA Guidelines Section 15126.6 states that an EIR shall select for evaluation a *"range of reasonable alternatives."* Among the factors described by CEQA Guidelines Section 15126.6 in determining whether to exclude alternatives from detailed consideration in the EIR are: a) failure to meet most of the basic project objectives, b) infeasibility, or c) inability to avoid significant environmental impacts. With respect to the feasibility of potential alternatives to the proposed Project, CEQA Guidelines Section 15126.6(f)(1) notes:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site…"*

The following development scenarios have been identified as potential alternatives to the implementation of the Project, and each alternative is analyzed and evaluated in Subchapters 4.2 through 4.4, below. A conclusion is provided for each impact as to whether the alternative results in

one of the following: 1) reduction or elimination of the impact; 2) a greater impact than the Project; 3) a same or similar impact as the Project; or 4) a new impact in addition to the Project impacts. Table 4-1 at the end of this chapter compares the environmental impacts of the alternatives with those of the Project. The alternatives considered in this section are:

- No Project/No Development Alternative – Alternative 1
- Reduced Project Alternative – Alternative 2
- Biological Avoidance Alternative – Alternative 3

These alternatives are compared to the impacts of the Project and are assessed to their ability to meet the basic objectives of the Project. As described in SEIR Chapter 1.0, Project objectives are as follows:

- To provide an appropriate mixture of business park uses in a manner that is consistent with the standards and requirements of the EOMSP, Subarea 2 and the Otay Subregional Plan;

- To assist the County in meeting regional demands for warehousing, manufacturing, assembly storage, science research and development, or other uses consistent with the standards and requirements of the EOMSP;

- To establish a phasing plan for the 161.6-acre site which is responsive to prevailing market conditions and which accommodates a proposed alternative alignment for SR-11 through the Project site;

- To provide for an efficient community-wide vehicular circulation network through on- and off-site road improvements, including the extension of Airway Road, Alta Road, and Siempre Viva Road; and

- To provide reasonable economic gain through creation of marketable business park lots.

4.1.1 Alternatives Considered But Rejected From Further Study

4.1.1.1 Alternative Site Locations

CEQA Guidelines Section 15126.6(f)(2) encourages the consideration of alternative locations for implementation of a proposed project. Specifically, the CEQA Guidelines requires consideration of alternative site locations if development of the project at the alternative location would result in substantial avoidance or lessening of the significant environmental effects of a proposed project. Only locations that would avoid or substantially lessen any of the significant effects of the proposed project need to be considered for inclusion in the EIR.

As identified in SEIR Chapter 1.0, the proposed Project seeks to implement the Mixed Industrial land use designation applied to the site by the EOMSP. The Project site is part of a much larger portion of the EOMSP Mixed Industrial land use designation, which encompasses approximately 2,372 acres of the East Otay Mesa portion of San Diego County. While the uses proposed for the Project could be constructed on any 160-acre portion of the 2,372 acres of Mixed Industrial lands within the EOMSP, construction of the Project anywhere within the EOMSP would result in impacts to air quality, biological resources, noise, and traffic that would be similar to those identified for the proposed Project. In addition, the Project applicant has ownership of the proposed Project site and does not

have ownership over any off-site locations within the Mixed Industrial land use designation in the EOMSP.

According to the 2000 US Census data[1], approximately 2,437.4 acres of undeveloped industrial land exists within San Diego County. However, when broken down by community planning areas, many communities within the County contain fewer than 160 acres of vacant industrial land. Communities with existing undeveloped industrial lands in excess of 160 acres include Desert, Lakeside, Ramona, San Dieguito, Sweetwater, and Valley Center. None of these locations would facilitate the provision of industrial land uses in a manner that would support cross-border transport and operations. In addition, most of these communities are rural in nature, and likely would lack the necessary infrastructure to support development of the proposed Project with 160 acres of industrial lands. Implementation of the proposed Project in these more remote communities has the potential to also result in significant impacts to traffic, noise, and air quality.

Therefore, based on a review of available industrial lands within the East Otay Mesa portion of San Diego County as well as all unincorporated lands within San Diego County, it is concluded that there are no available alternative site locations that would meet the Project's objectives while avoiding or substantially lessening the significant impacts of the proposed Project.

4.1.1.2 No Project/Existing Zoning Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that the evaluation of project alternatives should not only discuss the existing conditions at the time the notice of preparation is published, but also requires an evaluation of "…*what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services*."

As described throughout SEIR Chapter 1.0, the proposed Project seeks to implement the Mixed Industrial land use designation applied to the site by the EOMSP. If the proposed Project were not approved, it is reasonable to conclude that the site ultimately would be developed by others with Mixed Industrial land uses in a manner consistent with the EOMSP. Although there are multiple configurations for implementing Mixed Industrial land uses on-site, alternative configurations for the site already are proposed as part of the Reduced Project Alternative and the Biological Avoidance Alternative. For these reasons, no analysis of the No Project/Existing Zoning alternative is provided herein, as it is assumed that the No Project/Existing Zoning alternative would be identical to the proposed Project.

4.1.1.3 Diesel-Related Impact Avoidance Alternative

An alternative was considered for evaluation that would avoid the proposed Project's significant and unmitigable direct impacts to air quality due to the exposure of the MEIR and MEIW to levels of diesel particulates from heavy truck traffic that would result in an incremental cancer risk above County thresholds. Because incremental cancer risk is closely linked with diesel particulate emissions, the only effective strategy to reduce diesel particulate emissions would be to reduce truck trips to the site. Heavy truck trips are inherently linked to industrial operations; therefore, in order to reduce truck trips to the site, the development intensity of the site must also be reduced.

[1] http://datawarehouse.sandag.org/

According to information provided by the Project's air quality consultant in a telephone conversation on February 4, 2010, in order to reduce the Project's incremental cancer risk to an acceptable level, daily truck trips to the site would need to be reduced from 4,785 under the proposed Project to approximately 120 trips per day. To accommodate a maximum of 120 daily truck trips to the site, the building area would need to be reduced to approximately 32,813 s.f.[2], which would correspond to an approximately 98% reduction in development intensity as compared to the Project. It would not be financially feasible for the Project proponent to develop the 161.6-acre site with only 32,813 s.f. of industrial land uses; therefore, the Diesel-Related Impact Avoidance Alternative is rejected as infeasible and is not evaluated in this SEIR.

4.2 Analysis of the No Project/No Development Alternative

4.2.1 No Project/No Development Alternative Description and Setting

The No Project/No Development Alternative assumes that the Project site would be left in its existing condition (see Figure 1-8, *Aerial Photograph*), consisting primarily of vacant non-native grassland and disturbed areas. This alternative was selected by the Lead Agency to compare the environmental effects of the Project against leaving the property in its existing state.

4.2.2 Comparison of the Effects of the No Project/No Development Alternative to the Proposed Project

- **Air Quality**

Because no development would occur under the No Project/No Development Alternative, no impacts to air quality would result. Temporary air quality emissions during construction would be avoided, as would long-term air quality emissions associated with both vehicular and operational emissions. Furthermore, the No Project/No Development Alternative would eliminate the Project's long-term mobile-source GHG emissions. Implementation of the No Project/No Development Alternative would avoid impacts associated with air quality, and impacts would be considered less than those associated with the Project.

- **Biological Resources**

No direct impacts to on-site biological resources would occur under the No Project/No Development Alternative. The site would remain vacant and undeveloped, and no ground disturbing activities would occur. Vegetation communities existing on the site would remain, including vernal pools, saltgrass grassland, non-native grassland, road pools, disturbed habitat, and developed land. In addition, direct and cumulative impacts to eight (8) sensitive plant species and ten (10) sensitive animal species would be avoided. Selection of the No Project/No Development Alternative would avoid the Project's on-site impacts to biological resources.

It should be noted, in the long-term, the property would become an island of habitat, surrounded by the U.S./Mexico border to the south, industrial and business park development that is anticipated to occur to the west and north of the site, and a freeway and border crossing facility that is anticipated

[2] This figure is based on the assumption that industrial land uses would generate 16 trips per 1,000 s.f. of building area and that the vehicle mix would comprise 78% passenger vehicles and 22% heavy trucks (2+ axles). (Source: Transportation Engineering and Planning, Inc. *Truck Trip Generation Study*. Prepared for the City of Fontana, August 2003.)

to occur east of (but not adjacent to) the site. The isolation of on-site habitat areas, the increasing level of disturbance in the surrounding area, and the absence of a long-term habitat manager for the site would enable exotic species to invade and establish over increasingly greater areas, and may reduce the sustainability of on-site sensitive plant and wildlife species. Under the No Project/No Development Alternative, no mitigation can be required to off-set the long-term degradation of the quality of the on-site biological resources.

- **Cultural Resources**

The No Project/No Development Alternative would result in no grading; therefore, no impacts to subsurface archaeological resources would occur. Selection of this alternative would avoid potential impacts to subsurface resources associated with grading proposed by the Project.

- **Noise**

Because no development would occur under the No Project/No Development Alternative, no new noise would be generated. Temporary noise impacts during construction would be avoided, as would additional long-term noise impacts associated with development, such as vehicle and operational noise. Consequently, implementation of the No Project/No Development Alternative would avoid the Project's impacts associated with noise, and impacts would be less than those associated with the Project.

- **Paleontological Resources**

The No Project/No Development Alternative would result in no grading; therefore, no impacts to subsurface paleontological resources would occur. Selection of this alternative would avoid potential impacts to subsurface resources associated with grading proposed by the Project.

- **Public Services**

Because no additional structures would be constructed on-site, the No Project/No Development Alternative would avoid the Project's increased demand for sheriff and fire protection services. As with the proposed Project, implementation of the No Project/No Development Alternative would not result in an increased demand for public school or library facilities. Selection of the No Project/No Development Alternative would avoid all of the Project's public services impacts.

- **Transportation/Traffic**

Traffic associated with the Project would be eliminated as part of the No Project/No Development Alternative; therefore, the Project's contribution to significant direct and cumulative impacts would not occur. However, under the No Project/No Development Alternative there would be no participation by the Otay Business Park property owner in the construction of the ultimate on- and off-site roadway improvements that would alleviate existing and future unacceptable levels of service on street segments and intersections in the community. Furthermore, on-site segments of Airway Road/Siempre Viva Road – which are Circulation Element roadways designed to provide an east-west connection to Lone Star Road and other areas east of SR-11 – would not be constructed and cumulative traffic would be distributed to surrounding road networks. Consequently, implementation of the No Project/No Development Alternative would likely delay completion of local circulation

improvements and adversely affect traffic flows in the Project area. Relative to the Project, impacts to transportation and traffic would be mixed.

- **Utilities and Service Systems**

No additional domestic water or sewer facilities would be needed for the No Project/No Development Alternative, and no domestic water use or sewer generation increases would occur. Also, this alternative would not generate increases in the demand for stormwater drainage facilities. Selection of the No Project/No Development Alternative would avoid all of the Project's impacts to utilities and service systems.

- **Geologic Hazards**

Under the No Project/No Development Alternative, the Project site would remain undeveloped and there would be no risk related to hazards associated with geologic conditions. Because the Project would not result in significant impacts associated with geology, the degree of impact between this alternative and the proposed Project would be similar.

- **Hazards**

The site lies within an Urban-Wildland Interface (UWI) area, and is located within a "high" to "very high" wildfire hazard area. In addition, the site features a relatively high wildfire fuel load, primarily consisting of tall, dry grasses. Under the No Project/No Development Alternative, no development would occur, the site would stay in its existing condition and no fuel modification would occur. Under the No Project/No Development Alternative, the site would serve as a wildfire hazard to planned development in the area, due to the presence of high wildfire fuel loads on-site, which would facilitate the spread of wildfire. As such, selection of the No Project/No Development Alternative would result in greater impacts to hazards than the proposed Project.

- **Hydrology and Water Quality**

No changes to existing hydrology and drainage conditions would occur under the No Project/No Development Alternative. No stormwater improvements would be constructed and rainfall would be discharged from the site, as occurs under existing conditions. Because the proposed Project retains existing drainage patterns, neither the proposed Project nor the No Project/No Development Alternative would result in substantial alterations to the drainage pattern of the site. Accordingly, implementation of the proposed Project and the No Project/No Development Alternative would both result in less than significant impacts to existing drainage patterns.

Because buildings, roadways, and parking lots would not occur on the site under this alternative, an increase of impervious surfaces and urban pollutants would not occur. However, under this alternative, water leaving the site would not be filtered and would continue to contain sediment and other potential pollutants, as occurs under existing conditions. The potential for water quality impacts from an urban pollutant nature would be reduced under this alternative, but the potential for water quality impacts associated with sedimentation would be increased under this alternative. Implementation of the No Project/No Development Alternative would result in a reduced impact to hydrology and water quality as compared to the proposed Project, although erosion and sedimentation would continue to occur as water sheet flows off of the site's surface. Selection of this alternative would reduce the Project's impacts to hydrology and water quality with the exception of

long-term sedimentation impacts, which would be greater than would occur under the proposed Project.

4.2.3 Conclusion

Implementation of the No Project/No Development Alternative would result in no physical environmental impacts beyond those that have historically occurred on the property. All of the significant effects of the proposed Project would be avoided or lessened by selection of this alternative, with the exception of increased long-term impacts to water quality that would occur due to erosion and sedimentation and increased wildland fire hazards. Additionally, long-term traffic impacts would be mixed, as traffic volumes would be reduced under this alternative; however, there would be no improvements to on-site segments of Siempre Viva Road and Airway Road as called for by the County's General Plan and the EOMSP.

The No Project/No Development Alternative would fail to meet all of the Project's goals and objectives, as described above in Subchapter 4.1. This alternative would fail to develop an industrial business park to attract new businesses and jobs in the Otay Mesa area. Furthermore, retention of the site in its existing undeveloped condition would be inconsistent with the General Plan and the EOMSP, which call for development of the site with industrial land uses.

4.3 Analysis of the Reduced Project Alternative

4.3.1 Reduced Project Alternative Description and Setting

As shown on Figure 4-1, *Reduced Project Alternative*, the Reduced Project Alternative proposes to develop the site with industrial land uses at a lower intensity than proposed by the Project. The Reduced Project Alternative would develop the site with 44 industrial lots on 95.47 acres, two (2) detention basin lots on 4.96 acres, a drainage channel on 8.25 acres, approximately 34.49 acres of open space, and 18.43 acres of roadways. The Reduced Project Alternative would allow for the construction of up to approximately 1,663,469 square feet (s.f.) of industrial land uses[3], which would be a reduction of 365,207 s.f. (18.0%) in comparison to the proposed Project. Implementation of the Reduced Project Alternative would result in grading or disturbance over 131.78 acres, which would be a reduction of 29.82 acres (18.5%) in comparison to the proposed Project and would result in a concomitant reduction in the amount of grading required, including remedial grading. Like the proposed Project, the Reduced Project Alternative would require no net import or export of earthwork materials. Implementation of the Reduced Project Alternative would result in the preservation of 34.49 acres of the site as open space. Within the open space area, 4.67 acres immediately adjacent to industrial lots and drainage facilities would be disturbed by grading activities. Following the completion of grading and earthwork activities, open space areas disturbed by grading would be revegetated in accordance with County requirements to minimize erosion and sedimentation.

This alternative was selected for consideration to evaluate the potential effects of developing the site in a manner that may better achieve the greenhouse gas (GHG) emission reduction mandates of

[3] For purposes of analysis, a worst case intensity of 0.40 FAR has been assumed, which is in accordance with the maximum intensity permitted by the EOMSP, Subarea 2. It should be noted that for purposes of analysis within this SEIR, a worst-case intensity of 1,716,178 square feet of building area has been assumed. The worst-case building intensity is utilized in the analysis of traffic, air quality, and noise impacts associated with Project alternatives.

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act, which requires GHG emissions to be reduced to 25.0% below business as usual by 2020. By reducing industrial development intensity by 18.0%, as compared to the proposed Project, the Reduced Project Alternative would result in a proportional reduction in the number of vehicle trips, vehicular air emissions, and vehicular noise. In addition, this alternative was selected to evaluate the potential effects of developing the site with reduced limits of grading, which is likely to result in reduced impacts to on-site biological resources.

4.3.2 Comparison of the Effects of the Reduced Project Alternative to the Proposed Project

- **Air Quality**

As with the proposed Project, construction activities associated with the Reduced Project Alternative would result in significant direct and cumulative short-term impacts related to emissions of NO_x, PM_{10}, and $PM_{2.5}$. Implementation of the Reduced Project Alternative would result in similar daily construction emissions as the proposed Project, because it is assumed that construction activities would occur on-site over an eight hour period under either development scenario. However, because the Reduced Project Alternative would decrease the development footprint and total building area on-site, the overall duration of construction activities would be shortened and total aggregate construction emissions would be reduced as compared to the proposed Project. Accordingly, daily short-term construction emissions of NO_x, PM_{10}, and $PM_{2.5}$ associated with the Reduced Project Alternative would exceed County thresholds and mitigation would be required. As with the proposed Project, impacts would be reduced to a level below significant with the implementation of mitigation measures.

Long-term operational and vehicular emissions would be reduced under this alternative due to a reduction in building intensity and a resulting reduction in average daily trips from 33,486 to 27,459[4]. However, and as with the proposed Project, long-term operational and vehicular emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$ would exceed County thresholds of significance and emissions of diesel particulate matter would continue to exceed threshold levels for public health at the maximum point of impact. Selection of the Reduced Project Alternative would offer a reduction in long-term air quality impacts as compared to the Project; however, none of the Project's significant long-term air quality impacts would be avoided.

Near-term daily construction emissions of GHG would be similar to the proposed Project, but total aggregate construction emissions would be slightly reduced during construction, due to an approximately 18.0% reduction in the total development footprint and total building area. In the long-term, the Reduced Project Alternative would reduce operational and vehicular GHG emissions, as compared to the Project. Although near-term and long-term emissions would be reduced under this alternative, as compared to the Project, cumulative impacts would remain significant. Like the proposed Project, this alternative would be required to implement mitigation measures to reduce GHG emissions. Following implementation of required mitigation, cumulative impacts associated with construction and operational GHG emissions would be reduced to a level below significance.

[4] Trip generation for the Reduced Project Alternative was calculated using the trip generation rates from the *Otay Business Park (TM5505, ER-93-19-00006AA) – Supplemental Traffic Analysis*, prepared by Darnell and Associates, and dated January 6, 2010, which is incorporated herein as SEIR Appendix H2.

- **Biological Resources**

Implementation of the Reduced Project Alternative would reduce impacts to biological resources. This alternative proposed the development of 95.47 acres of industrial land uses, 18.43 acres of circulation facilities, 13.21 acres of drainage facilities, while the remaining 34.49 acres of the site would exist as open space. Within the open space area, approximately 4.67 acres adjacent to proposed industrial lots and drainage infrastructure would be disturbed by grading activities; however, following grading and earthwork activities these areas would be revegetated in accordance with County requirements.

Implementation of the Reduced Project Alternative would reduce impacts that would occur under the proposed Project to non-native grassland, vernal pool, and road pool vegetation communities, although it is important to note that impacts to these vegetation communities would not be completely avoided under this alternative. In addition, the Reduced Project Alternative would reduce, but not completely avoid, impacts to several sensitive animal species, including: burrowing owl, loggerhead shrike, white-tailed kite, San Diego fairy shrimp, Riverside Fairy shrimp, and the Quino checkerspot butterfly. Selection of the Reduced Project Alternative would also reduce, but not completely avoid, impacts to several sensitive plant species, including: variegated dudleya and chocolate lily. As with the proposed Project, impacts to the vegetation communities and sensitive plant and animal species listed above would be significant and mitigation would be required.

Additionally, selection of the Reduced Project Alternative would result in slight reductions in impacts to ACOE and CDFG jurisdictional waters on-site. A vernal pool and road pool located in the south-central portion of the site would be left in its natural condition. All other jurisdictional waters on-site would be impacted by development proposed under the Reduced Project Alternative. Impacts to jurisdictional waters that would occur under this alternative would be significant and mitigation would be required.

Impacts to all other sensitive biological resources identified in SEIR Subsection 2.2 would be similar to the proposed Project. However, as noted above, the Reduced Project Alternative would result in tangible reductions to biological impacts in comparison to the proposed Project.

- **Cultural Resources**

The Reduced Project Alternative would grade a 131.8-acre portion of the site at similar depths as the proposed Project. Implementation of this alternative would completely avoid one resource site and partially avoid two additional resource sites. In addition, due to a reduced total area of physical disturbance, the Reduced Project Alternative is considered to have less likelihood than the proposed Project to uncover previously unidentified cultural resources. However, this Alternative could still result in significant impacts to subsurface archaeological resources, if such resources are discovered during ground-disturbing activities, and mitigation would be required. Like the proposed Project, impacts would be reduced to a level below significant with incorporation of the required mitigation.

- **Noise**

Under the Reduced Project Alternative, daily noise emissions during construction would be similar to the proposed Project, as this SEIR assumes construction activities would occur on-site over an eight hour period per day under either development scenario. However, the total duration of on-site grading and construction activities would be reduced under this alternative due to a smaller

development footprint and reduced on-site building area. As with the proposed Project, this alternative would be required to implement mitigation measures to avoid significant noise impacts during grading. Following implementation of required mitigation, noise impacts during construction would be less than significant.

With respect to operations, the Reduced Project Alternative would result in permanent long-term increases to noise levels above ambient conditions, which would be similar to those which would occur under the proposed Project. However, the reduction in total building area on-site would result in the generation of approximately 6,027 fewer daily trips than the proposed Project, resulting in a concomitant reduction in vehicular noise levels, including off-site vehicular noise levels. Consequently, the Reduced Project Alternative would reduce the magnitude of direct and cumulative noise impacts to existing NSLUs located along Otay Mesa Road between Sanyo Avenue and Enrico Fermi Drive; however, impacts would remain significant and unavoidable (as previously identified in the EOMSP Final EIR).

- **Paleontological Resources**

The Reduced Project Alternative proposes to grade a 131.8-acre portion of the site at similar depths as proposed by the Project, and could result in significant impacts to subsurface paleontological resources – if such resources are discovered during ground disturbing activities conducted during grading and construction. Due to the reduced total area of physical disturbance, the Reduced Project Alternative would have less likelihood than the proposed Project to impact previously unidentified paleontological resources; however, impacts would still be evaluated as significant and mitigation would be required. Mitigation measures required to reduce those impacts to below a level of significance would be identical to those identified for the proposed Project (refer to SEIR Subchapter 2.5, *Paleontological Resources*). Like the proposed Project, impacts would be reduced to less than significant with incorporation of the required mitigation.

- **Public Services**

Implementation of the Reduced Project Alternative would result in an incremental increase in demand for sheriff services above existing conditions. This increase, however, would be lower than the demand identified for the proposed Project due to the 18.0% reduction in total building area on-site. However, there are currently no sheriff facilities in the East Otay Mesa area and the County Sheriff's department has insufficient personnel to provide law enforcement services to the East Otay Mesa area in conformance with County General Plan requirements. Due to the lack of adequate police protection services in East Otay Mesa, impacts would be considered significant and mitigation would be required. Public services impacts would be reduced through the incorporation of mitigation measures, and these impacts would be similar to the proposed Project.

According to the San Diego Rural Fire Protection District, adequate fire protection facilities are available to serve the site, and like the proposed Project, implementation of this alternative would not result in the need to construct a new fire station or physically alter an existing station. In addition, the Reduced Project Alternative would not create an increased demand for public school or library services, and would result in similar impacts as the proposed Project for these public services.

- **Transportation/Traffic**

According to an analysis prepared by Darnell and Associates (dated September 17, 2010 and incorporated herein as Appendix H2), implementation of the Reduced Project Alternative would result in the generation of approximately 27,459 average daily trips. This alternative would generate fewer daily trips than the proposed Project due to an 18.0% reduction in building area on-site.

The addition of traffic to the local roadway network under this alternative would result in direct and cumulative impacts at most of the same locations as would occur under the proposed Project and disclosed in Subchapter 2.7 of this SEIR, but to a lesser extent. It is not anticipated that this alternative would be able to eliminate any of the proposed Project's significant direct or cumulative impacts to study area roadway segments or intersections. As such, the Reduced Project Alternative would have many of the same mitigation requirements as the proposed Project, but impacts to transportation/traffic would be reduced overall.

- **Utilities and Service Systems**

Under the Reduced Project Alternative, construction of water, sewer, and drainage facilities would occur in roughly the same locations as proposed by the Project, resulting in similar physical impacts to the environment. However, demand for domestic water and sewer service and drainage facilities would be reduced, as compared to the Project, due to the reduction in total building area on-site. As with the proposed Project, these impacts would be less than significant.

- **Geologic Hazards**

The Reduced Project Alternative would reduce the grading footprint on-site by approximately 18%, as compared to the Project, which would result in concomitant reductions in the amount of earthwork on-site, including remedial grading. Under this alternative, the property would be developed in a similar fashion as the proposed Project, with the exception that this alternative would reduce the total building area on-site, and would be subject to similar potential geologic hazards. Accordingly, impacts to geology and soils under the Reduced Project Alternative would be similar to those identified for the proposed Project.

- **Hazards**

Under the Reduced Project Alternative, an approximate 34.5-acre open space parcel would be created in the southeast corner of the property. An approximate 4.7-acre portion of this open space area would be disturbed during grading activities on-site; but, would be revegetated in accordance with County standards following the completion of earthwork activities. The Project site is within a "high" to "very high" wildfire hazard area and in the event of a wildfire the vegetation on the open space parcel would provide a wildfire fuel and could facilitate the spread of wildfire to on-site structures and other structures in the surrounding area. As compared to the Project, the Reduced Project Alternative would result in greater impacts to hazards, due to the presence of a relatively large volume of vegetation on-site that could act as fuel for a wildland fire.

To minimize the risk to people and structures on-site, the proposed Project and the Reduced Project Alternative would be required to comply with an approved Fire Protection Plan (FPP) and applicable fire regulations. Compliance with the approved FPP and applicable building regulations would ensure that wildland fire hazards remain less than significant.

- **Hydrology and Water Quality**

The Reduced Project Alternative would grade approximately 131.8 acres of the site, which is 29.8 acres fewer than the proposed Project. As with the proposed Project, interim ground disturbance associated with grading operations for this alternative would result in short-term erosion and siltation with the potential to adversely affect water quality, although to a slightly lesser degree than the Project. Similar to the proposed Project, this alternative would require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) to control and/or reduce the discharge of pollutants to surface waters on- and off-site during construction.

Like the proposed Project, the Reduced Project Alternative would result in the permanent conversion of permeable surfaces to impervious surfaces and cause minor changes to the existing drainage characteristics of the site. The amount of impervious surfaces that would be installed under the Reduced Project Alternative for building pads, parking lots, drive aisles, and roadways, would be less than that which would occur under the proposed Project – due to the 18.0% reduction in building area. For this reason, the Reduced Project Alternative would result in a reduced total rate and flow of stormwater runoff when compared to the proposed Project. Like the proposed Project, this alternative would retain the property's existing stormwater runoff discharge points.

Under this alternative, water leaving the undeveloped portions of the site (*i.e.*, the open space parcel) would not be filtered and would be similar to runoff that leaves the site under existing conditions. It should be noted that runoff from the open space parcel would have the potential to contain sediment and other pollutants; however, runoff would be virtually identical to what exists under existing, natural conditions. As with the proposed Project, this alternative would be required to prepare a Water Quality Management Plan (WQMP) that would specify Best Management Practices (BMPs) for the treatment of urban polluted runoff for the developed portions of the property.

4.3.3 Conclusion

The Reduced Project Alternative would reduce the development area on-site by approximately 18%. The reduction in development intensity would result in reductions to the severity of traffic impacts, as compared to the Project, although none of the Project's significant impacts would be eliminated under this alternative (including the three unmitigable impacts to study area intersections). Implementation of the Reduced Project Alternative also would reduce the total duration of construction-related air quality and noise impacts, as compared to the Project; although, it is important to note that daily emission levels would be similar to the proposed Project. In addition, this alternative would reduce operational and vehicle-related noise and air quality impacts in the long-term. Although long-term noise and air quality impacts would be reduced as compared to the Project, impacts would remain significant and unmitigable, as no feasible mitigation measures are available to reduce impacts to less than significant levels (although the unmitigable noise impact was previously identified in the EOMSP Final EIR). This alternative also would incrementally reduce the Project's significant impact associated with long-term GHG emissions. Because a portion of the site would be preserved as open space under this alternative, the Reduced Project Alternative would reduce impacts to several sensitive biological resources on-site as well as several cultural resource sites. Although the Reduced Project Alternative would reduce biological resources and cultural resources impacts, as compared to the Project, impacts would remain significant and mitigation would be required. Impacts to utilities and service systems and hydrology/water quality would be

slightly reduced under this alternative, while impacts to hazards would be slightly increased. Impacts to all other issue areas would be similar to the proposed Project.

The Reduced Project Alternative would meet all of the Project's goals and objectives, but to a lesser degree than the proposed Project. This alternative would not eliminate any of the Project's significant and unavoidable effects, but would also reduce the severity of the Project's impacts to several issue areas of concern, including air quality, biological resources, noise, and traffic. However, development of the site with reduced building intensity would not result in an efficient use of the land and would create fewer employment opportunities for local residents. In addition, although the Reduced Project Alternative is proposed, in part, to reduce Project GHG emissions in order to better achieve the mandates of AB 32, restricting the amount of developable areas on the property achieves mixed results. Specifically, implementation of the Reduced Project Alternative has the potential to increase vehicle GHG emissions, due to increased VMT, as additional industrial development would be forced to occur farther from the planned border crossing facility and major roadway/freeway facilities to satisfy the demand for industrial land caused by the reduced building intensity on-site.

4.4 Analysis of the Biological Avoidance Alternative

4.4.1 Biological Avoidance Alternative Description and Setting

Under the Biological Avoidance Alternative (see Figure 4-2), approximately 31.4 acres of the site would be preserved as natural open space. This alternative was selected for consideration in order to assess the changes in environmental impacts associated with preserving on-site Non-wetland Waters of the U.S.; CDFG jurisdictional streambed and ephemeral pond; and a majority of vernal pool areas as conserved open space. By preserving on-site jurisdictional areas and a majority of on-site vernal pools, this alternative results in a reduction in building intensity and a concomitant reduction in the number of vehicle trips, vehicular noise and vehicular air emissions. The Biological Avoidance Alternative proposes to develop the site with 46 industrial lots on 105.0 acres, two (2) detention basin lots of 4.8 acres, and 20.4 acres of roadways. The Biological Avoidance Alternative would allow for the development of a maximum of 1,829,520 s.f. of industrial land uses on the property. In comparison to the proposed Project, the Biological Avoidance Alternative would reduce the development intensity on-site by approximately 199,156 s.f. (9.8%). This alternative would provide on-site segments of Airway Road and Siempre Viva Road with two clear span bridges over drainage courses, and related infrastructure improvements.

4.4.2 Comparison of the Effects of the Biological Avoidance Alternative to the Proposed Project

- **Air Quality**

Under the Biological Avoidance Alternative, impacts to air quality associated with grading and construction of on-site structures would be reduced as compared to the Project, due to reductions to the development footprint and a corresponding decrease in the development intensity of the site. Implementation of the Biological Avoidance Alternative would result in similar daily construction emissions as the proposed Project, because it is assumed that construction activities would occur on-site over an eight hour period under either development scenario. However, because the Biological Avoidance Alternative would decrease the development footprint, the overall duration of construction activities would be shortened as compared to the Project. Therefore, selection of this

alternative would result in incremental reductions to aggregate emissions of NO_x, PM_{10}, and $PM_{2.5}$ during grading and construction. Due to the relatively small reductions in grading and construction that would occur under this alternative, emissions of NO_x, PM_{10}, and $PM_{2.5}$ would still exceed County thresholds and mitigation would be required. As with the proposed Project, construction-level impacts would be reduced to a level below significant with the implementation of mitigation measures.

Similarly, long-term operational and vehicular emissions would be reduced under this alternative due to a reduction in building intensity and a resulting reduction in average daily trips from 33,486 under the proposed Project to 30,204 under the Biological Avoidance Alternative. However, and as with the proposed Project, long-term operational and vehicular emissions of VOCs, NO_x, CO, PM_{10}, and $PM_{2.5}$ would exceed County thresholds of significance and emissions of diesel particulate matter would continue to exceed threshold levels for public health at the maximum point of impact. Selection of the Biological Avoidance Alternative would offer a reduction in long-term air quality impacts as compared to the Project; however, none of the Project's significant long-term air quality impacts would be avoided.

Near-term construction emissions of GHG would be slightly reduced during grading and construction as compared to the Project, due to the slight reductions in total building area. In the long-term, the Biological Avoidance Alternative would achieve minimal reductions to operational and vehicular GHG emissions, as compared to the Project, and cumulative impacts would remain significant. This alternative would be required to implement similar mitigation as the proposed Project to reduce GHG emissions. Following implementation of required mitigation, cumulative impacts associated with GHG emissions would be reduced to less than significant levels.

- **Biological Resources**

Implementation of the Biological Avoidance Alternatives would reduce impacts to biological resources. This alternative proposes the development of 105.0 acres of industrial land uses, 20.4 acres of circulation facilities, and 4.8 acres of detention basins. The remaining 31.4 acres of the site would be conserved as natural open space, with a Resource Management Plan and habitat manager. Proposed Project impacts to saltgrass grassland would be avoided entirely under this alternative, as would impacts to several sensitive plant species (chocolate lily, variegated dudleya). Implementation of the Biological Avoidance Alternative also would greatly reduce impacts to the San Diego marsh elder, San Diego barrel cactus, burrowing owl, San Diego fairy shrimp, Riverside fairy shrimp, and Quino checkerspot butterfly; however, as with the proposed Project, impacts to these sensitive species would be significant and mitigation would be required.

Furthermore, selection of the Biological Avoidance Alternative would avoid impacts to many of the jurisdictional waters on the site. The Non-wetland Waters of the U.S. and CDFG streambed that traverses the site from north to south would be left in its natural condition, and clear span bridges would be constructed over these drainages to allow for vehicular access to the eastern and southern portions of the site via Siempre Viva Road and Airway Road. Vernal pool areas in the southern portion of the site also would be avoided.

Impacts to all other sensitive biological resources identified in SEIR Subsection 2.2 would be similar to the proposed Project. However, as noted above, the Biological Avoidance Alternative greatly reduces biological impacts in comparison to the proposed Project.

- **Cultural Resources**

The Biological Avoidance Alternative would grade a 130.2-acre portion of the site at similar depths as proposed by the Project. Implementation of this alternative would completely avoid one resource site and partially avoid two additional resource sites. The Biological Avoidance Alternative could result in significant impacts to subsurface archaeological resources, if such resources are discovered during ground-disturbing activities conducted during grading and construction. Due to the reduced total area of physical disturbance, the Biological Avoidance Alternative is considered to have less likelihood than the proposed Project to discover previously unidentified cultural resources; however, impacts would still be evaluated as significant and mitigation would be required. Like the proposed Project, impacts would be reduced to a level below significance with incorporation of the required mitigation.

- **Noise**

Implementation of the Biological Avoidance Alternative would result in similar daily noise emissions during construction as the proposed Project, as this SEIR assumes construction activities would occur on-site over an eight hour period per day under either development scenario. However, the total duration of on-site grading and construction activities would be reduced under this alternative due to a smaller development footprint and reduced building area. Consequently, construction noise levels associated with this alternative would be incrementally lower than the proposed Project. However, as with the proposed Project, construction activities are anticipated to generate a significant cumulative increase in noise levels above ambient conditions and mitigation would be required. With the implementation of required mitigation, construction-level impacts would be reduced to a less than significant and would be similar to the proposed Project.

With respect to operations, the Biological Avoidance Alternative would result in permanent long-term increases to noise levels above ambient conditions, similar to that which would occur under the proposed Project. The 9.8% reduction in the total building area on-site would generate approximately 3,282 fewer average daily trips than that estimated for the proposed Project, resulting in a slight reduction in vehicular noise levels. Because this alternative would generate fewer daily traffic trips, it is expected that this alternative would also reduce off-site noise levels. Impacts under this alternative to off-site NSLUs are, therefore, considered less than those of the proposed Project, but would remain significant and unavoidable.

- **Paleontological Resources**

The Biological Avoidance Alternative would grade a 130.2-acre portion of the site at similar depths as proposed by the Project. The Biological Avoidance Alternative could result in significant impacts to subsurface paleontological resources, if such resources are discovered during ground-disturbing activities conducted during grading and construction. Due to the reduced total area of physical disturbance, the Biological Avoidance Alternative is considered to have less likelihood than the proposed Project to discover previously unidentified paleontological resources; however, impacts would still be evaluated as significant and mitigation would be required. Like the proposed Project, impacts would be reduced to a level below significance with incorporation of the required mitigation.

- **Public Services**

Implementation of the Biological Avoidance Alternative would result in an incremental increase in demand for sheriff services above existing conditions. This increase, however, would be slightly lower than that identified for the proposed Project. However, there are currently no sheriff facilities in the East Otay Mesa area and the County Sheriff's department has insufficient personnel to provide law enforcement services to the East Otay Mesa area in conformance with County General Plan requirements. Due to the lack of adequate police protection services in East Otay Mesa, impacts would be considered significant and mitigation would be required. Public services impacts would be reduced to below a level of significance through the incorporation of mitigation measures, and would be similar to the proposed Project.

According to the San Diego Rural Fire Protection District, adequate fire protection facilities are available to serve the property, and like the proposed Project, implementation of this alternative would not result in the need to construct a new fire station or physically alter an existing station. In addition, the Biological Avoidance Alternative would not create an increased demand for public school or library services, and would result in similar impacts as the proposed Project for these public services.

- **Transportation/Traffic**

Implementation of the Biological Avoidance Alternative would result in the generation of approximately 30,204 average daily trips. This alternative would generate fewer daily trips than the proposed Project due to a 9.8% reduction in building area on-site.

The addition of traffic to the local roadway network under this alternative would result in direct and cumulative impacts at the same locations as would occur under the proposed Project and disclosed in Subchapter 2.7 of this SEIR, but to a slightly lesser extent. Due to the small decrease in average daily trips under the Biological Superior Alternative, it is not anticipated that this alternative would be able to eliminate any of the proposed Project's identified transportation and traffic impacts. Selection of the Biological Avoidance Alternative would slightly reduce the severity of impacts to the surrounding roadway system, but no impacts would be avoided and the same mitigation measures would be required.

- **Utilities and Service Systems**

The facilities required to service the site would be the same under the proposed Project and this alternative; however, the Biological Avoidance Alternative would slightly reduce the demand for water and sewer as compared to the proposed Project because the calculation of demand is based on building square footage and less building space would be constructed under this alternative. Thus, this alternative would result in slightly reduced impacts to utility and service systems as the proposed Project.

- **Geologic Hazards**

Under this alternative, the property would be developed in a similar fashion as the proposed Project, with the exception that this alternative would slightly reduce the total building area on-site, and both the Project and the Biological Avoidance Alternative would be subject to similar potential geologic

hazards. Accordingly, impacts to geology and soils under the Biological Avoidance Alternative would be similar to those identified for the proposed Project.

- **Hazards and Hazardous Materials**

Under the Biological Avoidance Alternative, an approximate 31.4-acre open space parcel would be created in the southern portion of the property. This area would consist of native habitat and would be precluded from brush management activities. The Project site is within a "high" to "very high" wildfire hazard area and in the event of a wildfire the vegetation on the open space parcel would act as a wildfire fuel and could facilitate the spread of wildfire to on-site structures and other structures in the surrounding area. As compared to the Project, the Biological Avoidance Alternative would result in greater impacts to hazards, due to the presence of a relatively large volume of vegetation on-site that could act as fuel for a wildland fire.

To minimize the risk to people and structures on-site, the proposed Project and the Biological Avoidance Alternative would be required to comply with an approved Fire Protection Plan (FPP) and applicable fire regulations. Compliance with the approved FPP and applicable building regulations would ensure that wildland fire hazards remain less than significant.

- **Hydrology and Water Quality**

The Reduced Project Alternative would grade 130.2 acres of the site, which is approximately 31.4 acres less than the proposed Project. As with the proposed Project, interim ground disturbance associated with grading operations for this alternative would result in short-term erosion and siltation with the potential to adversely affect water quality, although to a slightly lesser degree than the Project. Similar to the proposed Project, this alternative would require the preparation of a Stormwater Pollution Prevention Plan (SWPPP) to control and/or reduce the discharge of pollutants to surface waters on- and off-site during construction.

Like the proposed project, the Biological Avoidance Alternative would result in the permanent conversion of permeable surfaces to impervious surfaces and cause minor changes to the existing drainage characteristics of the site; however, this alternative would completely preserve an on-site drainage course on the eastern portion of the property. The amount of impervious surfaces that would be installed under the Biological Avoidance Alternative for building pads, parking lots, drive aisles, and roadways, would be slightly less than the proposed Project. For this reason, the Biological Avoidance Alternative would result in a reduced total rate and flow of stormwater runoff when compared to the proposed Project. Like the proposed Project, this alternative would retain the property's existing stormwater runoff discharge points.

Under this alternative, water leaving the undeveloped portions of the site (*i.e.*, the open space parcel) would not be filtered and would be similar to runoff that leaves the site under existing conditions. It should be noted that runoff from the open space parcel would have the potential to contain sediment and other pollutants; however, runoff would be virtually identical to what exists under existing, natural conditions. As with the proposed Project, this alternative would be required to prepare a Water Quality Management Plan (WQMP) that would specify Best Management Practices (BMPs) for the treatment of urban polluted runoff for the developed portions of the property.

4.4.3 Conclusion

This alternative would avoid impacts to several sensitive biological resources on-site, including Non-wetland Waters of the U.S., CDFG streambed and ephemeral ponds, saltgrass grassland, chocolate lily, and variegated dudleya. Impacts to a majority of vernal pools on-site would also be avoided. The Biological Avoidance Alternative would also substantially reduce impacts to the San Diego marsh elder, San Diego barrel cactus, San Diego fairy shrimp, Riverside fairy shrimp, burrowing, and the Quino checkerspot butterfly.

Because a portion of the site would be preserved as conservation open space under this alternative, the Biological Avoidance Alternative would reduce the development intensity of the site by approximately 9.8%. The reductions in development intensity would result in slight reductions in construction-related air quality and noise impacts, as compared to the Project. In addition, this alternative would slightly reduce operational and vehicle-related noise and air quality impacts in the long-term. Although long-term noise and air quality impacts would be reduced as compared to the Project, impacts would remain significant and unmitigable, as no feasible mitigation is available to reduce impacts to less than significant levels. The Biological Avoidance Alternative would generate slightly fewer trips than the Project; however, under this alternative, the addition of traffic to the local roadway network would result in significant and unavoidable direct and cumulative impacts at the same locations as would occur under the proposed Project. Impacts to utilities and service systems, cultural resources, and paleontological resources would also be reduced slightly under this alternative.

The Biological Avoidance Alternative would meet all of the Project's goals and objectives, but to a lesser degree than the proposed Project, while not eliminating any of the Project's significant and unavoidable effects. Although the Biological Avoidance Alternative would avoid and/or reduce several of the Project's physical impacts to on-site sensitive biological resources in the near-term, preserved areas on-site would create an island of habitat that may be subject to potential degradation in the long-term due to isolation, a lack of genetic diversity, and edge effects from the surrounding industrial development. For this reason, conserving natural habitat areas on-site may be unsustainable and may provide limited biological benefit.

4.5 Environmentally Superior Alternative

The discussion above evaluates the environmental effects of three (3) alternatives – the No Project/No Development Alternative, the Reduced Project Alternative, and the Biological Avoidance Alternative – with those of the proposed Project. The results of the alternatives analysis is summarized in Table 4-1, *Comparison of Environmental Impacts of Alternatives Relative to the Proposed Project*.

Selection of the No Project/No Development Alternative would retain the property in its existing state and would avoid the Project's impacts to air quality, biological resources, cultural resources, noise, paleontological resources, public services, and utilities and service systems. The No Project/No Development Alternative would result in mixed impacts to transportation/traffic and hydrology/water quality; impacts to hazards would be greater under this alternative, as compared to the Project. The Reduced Project Alternative would reduce Project impacts to air quality, biological resources, cultural resources, hydrology and water quality, noise, paleontological resources, transportation/traffic, and utilities and service systems. This alternative would result in similar impacts as the proposed Project to public services and geologic hazards. Under this alternative,

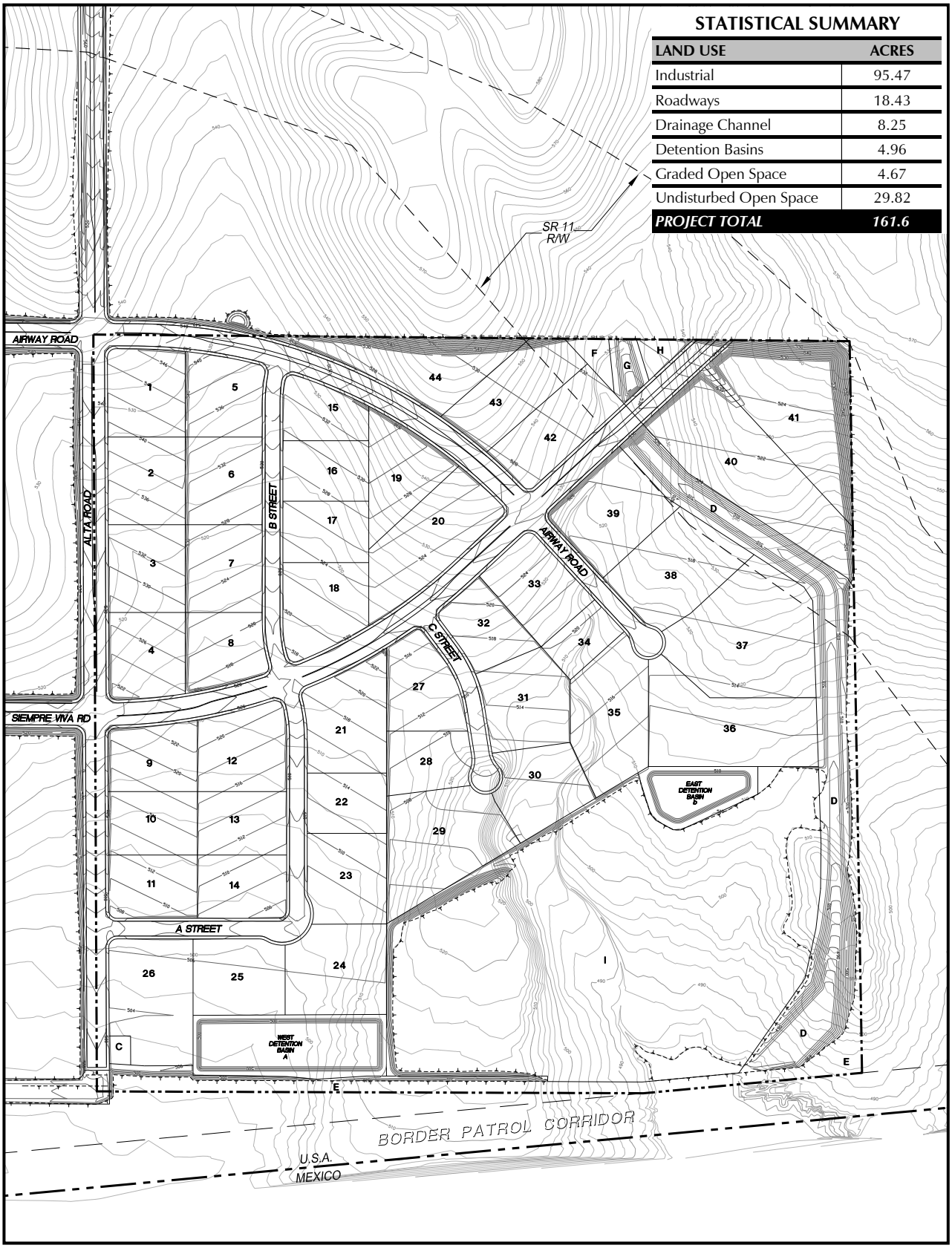
impacts to hazards would be greater than the proposed Project. Implementation of the Biological Avoidance Alternative would result in reduced impacts to air quality, biological resources, cultural resources, hydrology and water quality, noise, paleontological resources, transportation/traffic, and utilities and service systems, as compared to the Project. Under this alternative, impacts to hazards would be greater than the proposed Project. The Biological Avoidance Alternative would result in similar impacts as the Project to public services and geologic hazards.

The No Project/No Development Alternative would have the least effect to the environment because it would avoid and/or reduce a majority of the proposed Project's impacts. However, pursuant to CEQA Guidelines §15126.6(2), "*If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives*." When compared to the proposed Project, both the Reduced Project Alternative and the Biological Avoidance Alternative would substantially reduce impacts to the environment. The Reduced Project would result in fewer environmental impacts generally due to the greater reduction in building intensity proposed on-site. However, the Biological Avoidance Alternative would substantially reduce impacts to biological resources, as compared to the Reduced Project Alternative. Both alternatives would result in similar impacts to short-term air quality, cultural resources, short-term noise, paleontological resources, public services, utilities and service systems, geologic hazards, hazards, and hydrology and water quality. Long-term air quality, long-term noise, and traffic would be slightly reduced under the Reduced Project Alternative, as compared to the Biological Avoidance Alternative.

Although the Reduced Project Alternative and Biological Avoidance Alternative are very similar with respect to their ultimate impact on the environment, the Biological Avoidance Alternative is identified as the Environmentally Superior Alternative due to its substantial reduction in impacts to biological resources. The Biologically Avoidance Alternative would completely avoid Non-wetland Waters of the U.S., CDFG streambed and ephemeral ponds, saltgrass grassland, chocolate lily, and variegated dudleya, all of which would at least be partially impacted by the Reduced Project Alternative. In addition, the Biological Avoidance Alternative would substantially reduce impacts to vernal pools, the San Diego marsh elder, San Diego barrel cactus, San Diego fairy shrimp, Riverside fairy shrimp, and the burrowing owl, as compared to the Reduced Project Alternative. Although the Reduced Project Alternative would result in slightly reduced air quality, noise, and traffic impacts, as compared to the Biologically Avoidance Alternative, the benefits associated with the preservation/avoidance of sensitive biological resources on-site would outweigh the slight reductions in impacts to these other issue areas. For these reasons, the Biological Avoidance Alternative is identified as the Environmentally Superior Alternative.

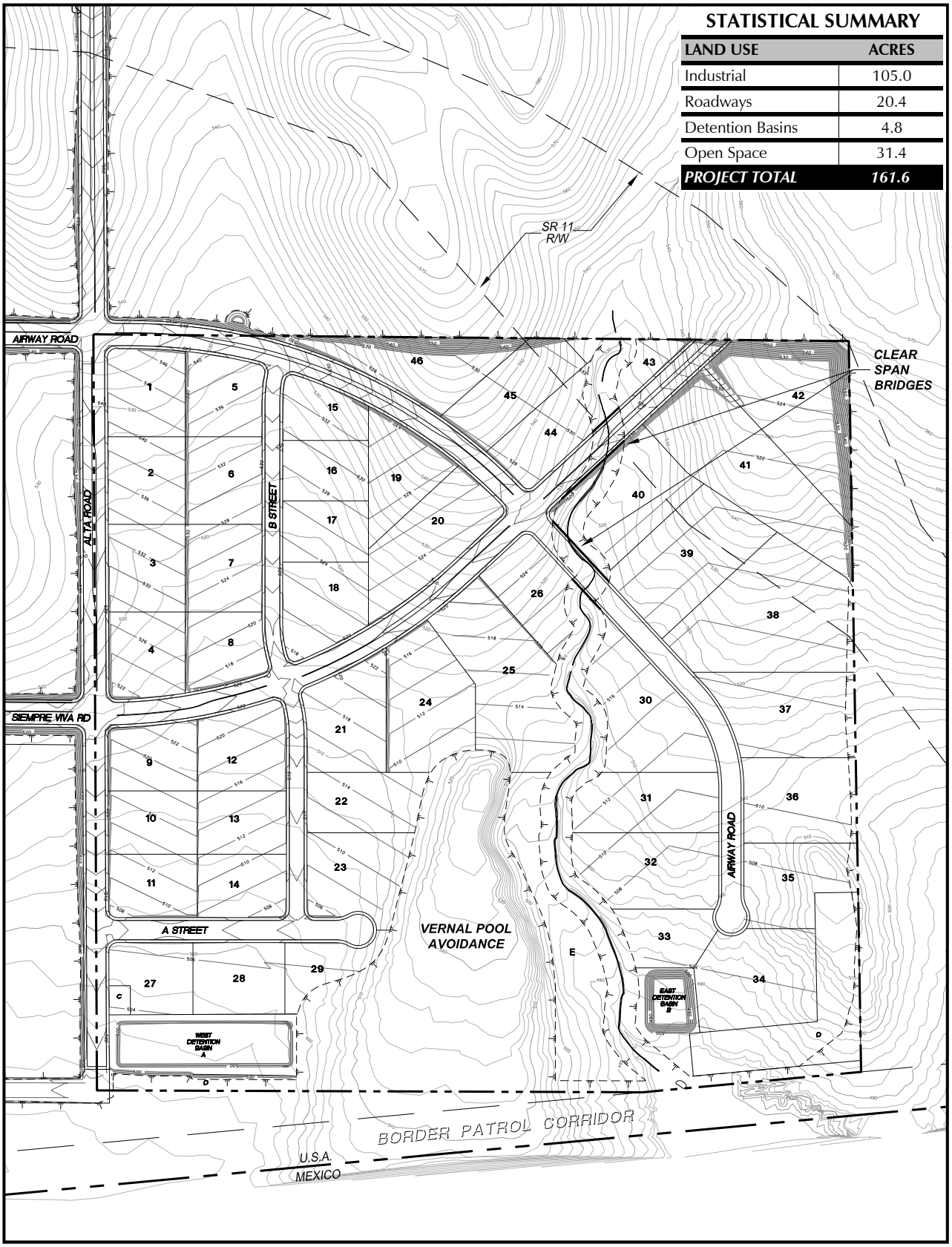
Table 4-1 COMPARISON OF ENVIRONMENTAL IMPACTS OF ALTERNATIVES RELATIVE TO THE PROPOSED PROJECT

ENVIRONMENTAL TOPIC	PROPOSED PROJECT LEVEL OF SIGNIFICANCE OF IMPACTS AFTER MITIGATION	LEVEL OF IMPACT COMPARED TO THE PROPOSED PROJECT		
		NO PROJECT/NO DEVELOPMENT ALTERNATIVE	REDUCED PROJECT ALTERNATIVE	BIOLOGICAL AVOIDANCE ALTERNATIVE
Air Quality	Significant	Avoided	Reduced	Reduced
Biological Resources	Less than Significant	Avoided	Reduced	Reduced
Cultural Resources	Less than Significant	Avoided	Reduced	Reduced
Noise	Significant	Avoided	Reduced	Reduced
Paleontological Resources	Less than Significant	Avoided	Reduced	Reduced
Public Services	Less than Significant	Avoided	Similar	Similar
Transportation/Traffic	Significant	Mixed	Reduced	Reduced
Utilities and Service Systems	Less than Significant	Avoided	Reduced	Reduced
Geologic Hazards	Less than Significant	Similar	Similar	Similar
Hazards	Less than Significant	Greater	Greater	Greater
Hydrology and Water Quality	Less than Significant	Mixed	Reduced	Reduced



Source: Kimley-Horn and Associates, 2009

FIGURE 4-1
Reduced Project Alternative



Source: Kimley-Horn and Associates, 2009

0 250 500 Feet

FIGURE 4-2
Biological Avoidance Alternative